REMARKS

The Applicants respectfully request reconsideration of this application in view of the above amendments and the following remarks.

35 U.S.C. §102(b) Rejection - Hsu

The Examiner has rejected claims 22-23, 27-28 and 45-46 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,288,896 issued to Hsu (hereinafter referred to as "Hsu"). The Applicants respectfully submit that these claims are allowable over Hsu.

Claim 22 pertains to a display comprising:

"*a lamp to illuminate the display; and*

*a heat pipe including a liquid capable of vaporizing coupled to the lamp to transfer heat from a heat generating component of a system to the lamp in the display, **wherein the heat pipe is coupled to an end of the lamp***".

Hsu does not teach or suggest these limitations. In particular, Hsu does not teach or suggest that the heat pipe is coupled to an **end** of the lamp. Applicants respectfully submit herewith a definition of "end" from Webster's II New College Dictionary as Appendix A. End is defined as "either **extremity** of an object having length". The Examiner has relied upon Figure 8 of Hsu and has asserted that heat pipe [30] is coupled to an end of the lamp [90]. Applicants respectfully disagree. Heat pipe [30] clearly is not coupled to an **extremity** of the lamp [90] but rather at a central portion thereof.

Anticipation under 35 U.S.C. Section 102 requires every element of the claimed invention be identically shown in a single prior art reference. The Federal Circuit has indicated that the standard for measuring lack of novelty by anticipation is **strict identity**. "*For a prior art reference to anticipate in terms of 35 U.S.C. Section 102, every element*

of the claimed invention must be identically shown in a single reference." In Re Bond, 910 F.2d 831, 15 USPQ.2d 1566 (Fed. Cir. 1990).

For at least these reasons, claim 22 and its dependent claims are believed to be allowable over Hsu.

35 U.S.C. §102(e) Rejection - Hsu

The Examiner has rejected claims 29-35 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Publication No. 2003/0132929 issued to Woo (hereinafter referred to as "Woo"). The Applicants respectfully submit that these claims are allowable over Woo.

Claim 29 pertains to a system comprising:

"*a display and a lamp to illuminate the display;*

at least one heat generating component;

a transfer unit to transfer heat from the heat generating component to the lamp; and

a unit to control a level of heat provided to the lamp to maintain a level of brightness generated by the lamp".

Woo does not teach or suggest these limitations. In particular, Woo does not teach or suggest a unit to control a level of heat provided to the lamp to maintain a level of brightness generated by the lamp.

Woo discusses a sensing step and a causing step. See e.g., the Abstract. The sensing step includes sensing a temperature of a peripheral device (i.e., a liquid crystal display). The causing step includes causing power to be provided to the peripheral device **according to the sensed temperature.** As shown in Fig. 3 of Woo, especially at blocks 307, 310, and 312, voltage and current are controlled based on the sensed

temperature. However, there is no teaching or suggestion of controlling the amount of heat provided to the lamp.

Accordingly, Woo discusses controlling **power** based on **temperature**, but does not teach or suggest controlling a level of **heat** provided to the lamp to maintain a level of **brightness** generated by the lamp. There is a distinction between the two.

Anticipation under 35 U.S.C. Section 102 requires every element of the claimed invention be identically shown in a single prior art reference. The Federal Circuit has indicated that the standard for measuring lack of novelty by anticipation is **strict identity**. "*For a prior art reference to anticipate in terms of 35 U.S.C. Section 102, every element of the claimed invention must be identically shown in a single reference.*" In Re Bond, 910 F.2d 831, 15 USPQ.2d 1566 (Fed. Cir. 1990).

For at least these reasons, claim 29 and its dependent claims are believed to be allowable over Woo.

35 U.S.C. §103(a) Rejection – Hus and Woo

The Examiner has rejected claims 24-26, 36, 40-44, 47 and 49-50 under 35 U.S.C. §103(a) as being unpatentable over Hsu in view of Woo. The Applicants respectfully submit that these claims are allowable over Hsu and Woo.

Claim 36 pertains to an apparatus comprising:

"*at least one heat generating component;*

a transfer unit to transfer heat from the at least one heat generating component to a lamp of a display, wherein the transfer unit comprises a heat pipe including a liquid capable of vaporizing proximate the lamp, and wherein the transfer unit comprises a ***fan or synthetic jet unit to generate air movement across the heat pipe*** *and have the heated air flow against the lamp*".

Hsu and Woo do not teach or suggest these limitations. In particular, Hsu and Woo do not teach or suggest a fan or synthetic jet unit to generate air movement across the heat pipe and have the heated air flow against the lamp.

The Examiner appears to have asserted that Woo discloses a fan [120] to generate air movement across the heat pipe [130] and have the heated air flow against the lamp [150]. However, **component [130] is not a heat pipe, but rather a duct [130].** See e.g., paragraph [0019]. It is inappropriate to consider the duct [130] a heat pipe, since heat pipes are devices well known in the art as exemplified at least by Hsu. Furthermore, Applicants have carefully reviewed Woo and have determined that **Woo does not even mention the words "heat pipe".** Accordingly, Woo absolutely does not teach or suggest a fan or synthetic jet unit to generate air movement across the heat pipe and have the heated air flow against the lamp. Furthermore, **Hsu teaches away from using fans.** See e.g., column 1, line 37; column 2, lines 3-5; and column 9, line 21.

Accordingly, it is simply inappropriate to conclude that Hsu and Woo teach or suggest a fan or synthetic jet unit to generate air movement across the heat pipe.

For the foregoing reasons, Applicants submit that the Examiner has failed to establish a prima facie case of obviousness set forth in MPEP Section 706.02(j). Specifically, the Examiner has failed to show that "*[t]he teaching or suggestion to make the claimed combination ... [is] found in the prior art, and not based on Applicant's disclosure*", as required by In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

For at least these reasons, claim 36 and its dependent claims are believed to be allowable over Hsu and Woo.

Conclusion

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the prior art of record and are in condition for allowance. Applicants respectfully request that the rejections be withdrawn and the claims be allowed at the earliest possible date.

Request For Telephone Interview

The Examiner is invited to call Brent E. Vecchia at (303) 740-1980 if there remains any issue with allowance of the case.

Request For An Extension Of Time

The Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17 for such an extension.

Charge Our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: 11-1-06

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Appendix A

Definition of "end" from Webster's II New College Dictionary

Riverside

Webster's II New College Dictionary

MORE THAN 200,000 clear, concise definitions

THOUSANDS of examples of words in actual use

NEW ENTRIES from *acupressure* to *Z particle*

UPDATED biographical and geographical sections

HUNDREDS of synonyms and word histories

FEATURES on usage, style, spelling, and more!

Words are included in this Dictionary on the basis of their usage. Words that are known to have current trademark registrations are shown with an initial capital and are also identified as trademarks. No investigation has been made of common-law trademark rights in any word, because such investigation is impracticable. The inclusion of any word in this Dictionary is not, however, an expression of the Publisher's opinion as to whether or not it is subject to proprietary rights. Indeed, no definition in this Dictionary is to be regarded as affecting the validity of any trademark.

Library of Congress Cataloging-in-Publication Data

Webster's II new college dictionary.
p. cm.

ISBN 0-395-70869-9 (alk. paper)
1. English language – Dictionaries. I. Webster's II new Riverside University dictionary
PE1628.W55164 1995
423 – dc20

95-5833
CIP

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Printed in the United States

adj. 1. Of or relating to (th
.ty.
i'tis) *n.* Brain inflammati
:a (lə-thär'ji-kə) *n.* [NLat.
encephalitis often associate
athy, double vision, and ex

pref. [NLat. < Gk. (*muslon*)
in + *kephalē.* head.] Brain
'>lō-gram') *n.* 1. An x-ray
aphy. 2. An electroencephalo
séf'ə-lōg'rə-fē) *n., pl.* -phi
a·lo·graph' (-lə
di. —en·ceph'a·lo·graph
ō'mə) *n., pl.* -mas *or* -ma
(ĕn-sĕf'ə-lō-mī'ə-lī'tĭs) *n.* A
ae brain and spinal cord.
') *n., pl.* -la (-lə) [NLat. <
. in the head. —see ENCEPHAL
ph'a·lous *adj.*
(ĕf'ə-lōp'ə-thē) *n., pl.* -thies
a·lo·path'ic (-lə-păth'ĭk)
ined, -chain·ing, -chains
n-, in (< Lat. *in-*) + *chaine*
ne with or as if with chains
ınt·ed, -chant·ing, -chan
Lat. *incantare* : *in-* against +
: BEWITCH. 2. To charm and
nt *n.*
1. One that enchants. 2. a. A
adj. Capable of enchanting
n. 1. a. A woman who practic
ng woman.
ed, -chas·ing, -chases. [
gems : *en-.* in (< Lat. *in-*)
t (e.g., a gem). 2. To set with
ate by inlaying or engraving.
1. [Mex. Sp. : *en-.* in (< Lat.
illi.] A tortilla rolled and stuf
e and served with a sauce spic
m) *n., pl.* -i·ons *or* -i·a (-ē
nd + *-idion,* dim. suffix.] A ha
AA.] Cellular tissue <chloroph
n oak < LLat. *ilicina* < Lat. *ilex*
ia of southwestern North A
ered, -pher·ing, -phers.
ci'pher·ment *n.*
d, -cling, -cles. 1. To form a
e or go around completely
n.
ped, -clasp·ing, -claspe. To
: < OFr. *enclaver,* to enclose <
lavis, key.] 1. A country or par
another country. 2. A minority
re while living within a larger
cities>
ncliticus, being an enclitic
ɔ : *en-.* in + *klinein,* to lean.] A
nt accent and forms an accentu
ith the preceding word; e.g., in
sm is an enclitic.
d, -clos·ing, -clos·es. [M
nclore < Lat. *includere,* to inc
surround on all sides. 2. a. To
the same envelope or packag
o prevent common use.
The act of enclosing or state of
3. Something that encloses.
l, -cod·ing, -codes. 1. To
Sci. To convert (a character)
—en·cod'er *n.*
·ast) *n.* [Gk. *enkōmiastēs* < *enk*
omium.] One who delivers or

ē pet ē be hw which
ô paw, for oi noise oō

mium : EULOGIST. —en·co'mi·as'tic (ĕn-kō'mē-ăs'tĭk),
al·as'ti·cal (-tĭ-kəl) *adj.*
·um (ĕn-kō'mē-əm) *n., pl.* -mi·ums *or* -mi·a (-mē-ə)
mium < Gk. *enkōmion* (*epos*), (speech) praising a victor <
of the victory procession : *en-.* in + *kōmos,* celebration.] 1.
tic. 2. A formal expression of praise : TRIBUTE.
pass (ĕn-kûr'pəs) *vt.* -passed, -pass·ing, -pass·es.
a circle about : SURROUND. 2. To envelop : enclose. 3. To
an integral part : INCLUDE. 4. To achieve : accomplish. —en·
ge·ment *n.*
(ŏn'kôr', -kōr') *n.* [Fr., again.] 1. An audience's demand for
nal performance. 2. An additional performance in response
ence demand. —*vt.* -cored, -cor·ing, -cores. To demand
ore. —*interj.* —Used to demand an additional performance.
·ter (ĕn-koun'tər) *n.* [ME *encountre* < OFr. < *encontrer,* to
< LLat. *incontrare* : Lat. *in-.* in + Lat. *contra,* against.] 1. An
ed or unplanned meeting. 2. A usu. brief meeting. 3. a. A hos
mination. b. An often violent meeting : CLASH. —*v.* -tered,
ter·ing, -ters. —*vt.* 1. To meet or come upon (someone or some
esp. unexpectedly. 2. To confront in a hostile situation. 3. To be
<*encounter* strung enemy forces> —*vi.* To meet, esp. un
ly.
ter group *n.* A psychotherapy group in which individuals
crease their sensitivity and self-awareness.
·age (ĕn-kûr'ĭj, -kŭr'-) *vt.* -aged, -ag·ing, -ag·es. [ME
·· OFr. *encoragier* : *en-* (causative) + Lat. *in-.* in + *corage,*
< Lat. *cor,* heart.] 1. To inspire with hope, courage, or confi
HEARTEN. 2. To give support to : FOSTER. 3. To stimulate.
·our'age·ment (-mənt) *n.* —en·cour'ag·er *n.*
SYNS: ENCOURAGE, CHEER (UP), HEARTEN, NERVE, PERK UP *v. core*
ing : to impart strength and confidence to <were *encouraged* by
tors' findings> *ANT:* DISCOURAGE
·ag·ing (ĕn-kûr'ə-jĭng, -kŭr'-) *adj.* Imparting hope or cour
—en·cour'ag·ing·ly *adv.*
·roach (ĕn-krōch') *vi.* -croached, -croach·ing, -croach·
[ME *encrochen,* to seize illegally < OFr. *encrochier,* to seize : *en-.*
Lat. *in-*) + croc, hook, of Scand. orig.] 1. To intrude gradually on
ights or possessions of another <road construction *encroaching*
city park> 2. To advance beyond proper or prescribed limits.
·roach'er *n.* —en·croach'ment *n.*
·rust (ĕn-krŭst') *vt.* -crust·ed, -crust·ing, -crusts. [Prob.
encruster < Lat. *incrustare* : *in-* upon + *crusta,* crust.] To cover
ament with or as if with a crust <a coffee cake *encrusted* with
—en'crust·a'tion *n.*
·crypt (ĕn-krĭpt') *vt.* -crypted, -crypt·ing, -crypts. 1. EN
1. 2. *Computer Sci.* To encipher or encode (data) in order to pre
ithorized entry into a system.
·cryp·tion (ĕn-krĭp'shən) *n. Computer Sci.* A process for enci
ng or encoding data to prevent illicit entry into a system.
·cum·ber (ĕn-kŭm'bər) *vt.* -bered, -ber·ing, -bers. [ME *en-*
OFr. *encombrer,* to block up : *en-.* in (< Lat. *in-*) + *combre,*
ance.] 1. To weigh down unduly. 2. To impede or hinder the ac
or performance of. 3. To burden, as with legal claims.
·cum·brance (ĕn-kŭm'brəns) *n.* 1. One that encumbers : IM
DIMENT. 2. *Law.* A lien or claim on property.
·cum·branc·er (ĕn-kŭm'brən-sər) *n. Law.* One holding an en
brance.
·cy *suff.* [Lat. *-antia.* —see -ENCE.] -ENCE.
·cy·cli·cal (ĕn-sĭk'lĭ-kəl) *adj.* [LLat. *encyclicus,* circular < Gk.
kuklios : *en-.* in + *kuklos,* circle.] Intended for general circulation.
n. Rom. Cath. Ch. A papal letter addressed to bishops or the hi
rchy of a specific country.
·cy·clo·pe·di·a *or* en·cy·clo·pae·di·a (ĕn-sī'klə-pē'dē-ə)
ed. Lat. *encyclopaedia,* general education course < Gk. *enku-*
klopaideia < *enkúklios paideia,* general education.] A comprehensive
ence work having articles on a broad range of subjects or on nu
ous aspects of a given field, usu. arranged alphabetically.
·cy·clo·pe·dic *or* en·cy·clo·pae·dic (ĕn-sī'klə-pē'dĭk)
1. Of, relating to, or typical of an encyclopedia. 2. Embracing
ous subjects : COMPREHENSIVE <*encyclopedic* learning> —en·
·clo·pe'di·cal·ly *adv.*
·cy·clo·pe·dism *or* en·cy·clo·pae·dism (ĕn-sī'klə-pē'-
dĭ'zəm) *n.* Encyclopedic knowledge : ERUDITION.
·cy·clo·pe·dist *or* en·cy·clo·pae·dist (ĕn-sī'klə-pē'dĭst)
A writer for or compiler of an encyclopedia.
·cyst (ĕn-sĭst') *v.* -cyst·ed, -cyst·ing, -cysts. —*vt.* To en
in or as if in a cyst. —*vi.* To form or become enclosed in a cyst.
·cyst·ment, en'cys'ta'tion *n.*
·d (end) *n.* [ME *ende* < OE.] 1. Either extremity of an object having
gth. 2. The outside or extreme edge : BOUNDARY. 3. The point at
ich an act, event, or phenomenon ceases or is completed : CONCLU
ON. <the *end* of the campaign> 4. A result : outcome. 5. Termina
n of life : DEATH. 6. An ultimate extent : LIMIT <the *end* of one's
ence> 7. A goal toward which one strives. 8. A remnant. 9. a. A

ŏ book ou out th thin *th* this û cut ûr urge y young
zh vision ə about, item, edible, gallop, circus

share of a responsibility or obligation <your *end* of the project> b. A particular area of responsibility <in charge of the publicity *end* of the campaign> 10. *Football.* a. Either of the players in the outermost position at the line of scrimmage. b. The position played by such a player. —*v.* end·ed, end·ing, ends. —*vt.* 1. To bring to an end : FINISH. 2. To form the end or concluding part of. 3. To destroy. —*vi.* 1. To come to an end : CEASE. 2. To die. —**make (both) ends meet.** To live within one's means. —**no end.** *Informal.* A great deal <*no end* of odd jobs to finish> —**on end.** Upright. —**to no end.** To no purpose.

★ *syns:* END, CLOSE, COMPLETE, CONCLUDE, FINISH, TERMINATE, WIND UP *v. core meaning* : to bring to a natural or proper end <*ended* the letter with thanks> <a performance that *ended* at 10 P.M.> *ants:* BEGIN, START

end- *pref. var. of* ENDO-.

en·da·moe·ba *or* **en·da·mc·ba** (ĕn'də-mē'bə) *n. vars. of* ENTAMOEBA.

en·dan·ger (ĕn-dān'jər) *vt.* -gered, -ger·ing, -gers. To expose to danger or harm : IMPERIL. —en·dan'ger·ment *n.*

endangered *adj.* Threatened with extinction <an *endangered* species>

end-ar-te-rec-to-my (ĕn'där-tə-rĕk'tə-mē) *n., pl.* -mies. [NLat. *endarterium,* inner lining of an artery + -ECTOMY.] Surgical excision of the inner lining of an artery clogged with atherosclerotic buildup.

end-ar-te-ri-tis (ĕn'där-tə-rī'tĭs) *n.* [NLat. *endarterium,* inner lining of an artery + -ITIS.] Inflammation of the inner lining of an artery.

end-brain (ĕnd'brān') *n.* The telencephalon.

en·dear (ĕn-dîr') *vt.* -deared, -dear·ing, -dears. 1. To make beloved. 2. *Obs.* To increase the value of.

en·dear·ing (ĕn-dîr'ĭng) *adj.* Arousing affection or warm sympathy <an *endearing* child> —en·dear'ing·ly *adv.*

en·dear·ment (ĕn-dîr'mənt) *n.* 1. The act of endearing. 2. An expression of affection, as a caress.

en·deav·or (ĕn-dĕv'ər) *n.* [ME *endevour* < *endeveren,* to make an effort : *en-.* en- + *dever,* duty < OFr. *devoir,* duty. —see DEVOIR.] A concerted or conscientious effort toward a given end. —*vi.* -ored, -or·ing, -ors. To make an earnest attempt. —en·deav'or·er *n.*

en·deav·our (ĕn-dĕv'ər) *n.* & *v. Chiefly Brit. var. of* ENDEAVOR.

en·dem·ic (ĕn-dĕm'ĭk) *adj.* [Gk. *endēmos* : *en-.* in + *dēmos,* people.] 1. Prevalent in or peculiar to a particular locality or people. 2. *Ecol.* Native or limited to a certain region. 3. *Med.* Peculiar to a particular locality <an *endemic* disease> —*n. Ecol.* An endemic plant or animal. —en·dem'i·cal·ly *adv.* —en·dem'ism *n.*

end-er-gon-ic (ĕn'dər-gŏn'ĭk) *adj.* [ENDO(-) + Gk. *ergon,* work + -IC.] Needing energy.

en·der·mic (ĕn-dûr'mĭk) *adj.* Acting medicinally by absorption through the skin. —en·der'mi·cal·ly *adv.*

end game *n.* 1. The last stage of a game, esp. the stage of a game of chess after most of the pieces have been removed from the board. 2. The final stage of an extended process or course of events.

end-ing (ĕn'dĭng) *n.* 1. A conclusion : termination. 2. The concluding part : FINALE. 3. An element added to a word base, esp. to create an inflected form.

en·dive (ĕn'dĭv', ŏn'dēv') *n.* [ME < OFr. < Lat. *intibum.*] 1. A plant, *Cichorium endivia,* cultivated for its crown of crisp, succulent leaves used in salads. 2. A variety of the common chicory, *Cichorium intybus,* cultivated to produce a narrow, pointed cluster of whitish leaves used in salads.

end leaf *n.* An endpaper.

end-less (ĕnd'lĭs) *adj.* 1. Being or appearing to be without an end : BOUNDLESS. 2. Interminable : incessant <an *endless* sermon> 3. Formed with the ends joined : CONTINUOUS <*endless* coils of rope> —end'less·ly *adv.* —end'less·ness *n.*

end-long (ĕnd'lông', -lŏng') *adv. Archaic.* Lengthwise.

end man *n.* 1. The person at the end of a line or row. 2. The man in a minstrel show who sits at one end of the company and banters with the interlocutor.

end matter *n.* Back matter.

end·most (ĕnd'mōst') *adj.* Being at or nearest to the end : LAST.

end·note (ĕnd'nōt') *n.* A note placed at the end of an article, chapter, or book that comments on or cites a reference for a designated part of the text.

endo- *or* **end-** *pref.* [Gk. < *endon,* within.] Inside : within <*endometrium*>

en·do·bi·ot·ic (ĕn'dō-bī-ŏt'ĭk) *adj.* Living within the tissues of a host.

en·do·blast (ĕn'dō-blăst') *also* **en·to·blast** (ĕn'tō-) *n.* The inner layer of the blastoderm. —en'do·blas'tic *adj.*

en·do·car·di·tis (ĕn'dō-kär-dī'tĭs) *n.* [ENDOCARD(IUM) + -ITIS.] Inflammation of the endocardium. —en'do·car·dit'ic (-dĭt'ĭk) *adj.*

en·do·car·di·um (ĕn'dō-kär'dē-əm) *n., pl.* -di·a (-dē-ə) [NLat. : ENDO- + Gk. *kardia,* heart.] The thin, endothelial, serous membrane lining the interior of the heart. —en'do·car'di·al *adj.*

en·do·carp (ĕn'dō-kärp') *n.* The often hard or leathery inner layer of the pericarp of many fruits. —en'do·car'pal *adj.*

en·do·cra·ni·um (ĕn'dō-krā'nē-əm) *n., pl.* -ni·a (-nē-ə). The dura mater.

en·do·crine (ĕn'də-krĭn, -krēn', -krīn') *also* **en·do·crin·ic** (-krĭn'ĭk) *or* **en·doc·ri·nous** (-dŏk'rə-nəs) *adj.* [ENDO- + Gk. *kri-*